

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address AARON E. DE LEEST (State Bar No. 132426) adeleest@DanningGill.com DANNING, GILL, ISRAEL & KRASNOFF, LLP 1901 Avenue of the Stars, Suite 450 Los Angeles, California 90067-6006 Telephone (310) 277-0077 Facsimile (310) 277-5735 <input type="checkbox"/> Plaintiff(s) appearing without attorney <input checked="" type="checkbox"/> Attorney for Plaintiff(s)	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION	
In re: JAMIE LYNN GALLIAN, JEFFREY I. GOLDEN, Chapter 7 Trustee, vs. J-SANDCASTLE CO., LLC; J-PAD LLC; STEVEN D. GALLIAN; BRIAN J. GALLIAN; JUSTIN BARCLAY; RONALD J. PIERPONT; ROBERT J. MCLELLAND; AND E. J. GALLIAN,	CASE NO.: 8:21-bk-11710-SC CHAPTER: 7 ADVERSARY NO.: 8:23-ap-01064-SC REQUEST FOR CLERK TO ENTER DEFAULT UNDER LBR 7055-1(a) [No Hearing Required]

TO THE DEFENDANT, DEFENDANT'S ATTORNEY AND OTHER INTERESTED PARTIES:

1. Name of Defendant against whom default is sought (*specify name*): J-PAD LLC
2. Plaintiff filed the complaint in this adversary proceeding on (*specify date*): 06/30/2023
3. The summons and complaint were served on Defendant by ☐ Personal Service ☒ Mail Service on the following date (*specify date*): 07/06/2023
4. A conformed copy of the executed service of summons form is attached hereto.
5. The time for filing an answer or other responsive pleading expired on (*specify date*): 08/02/2023
6. No answer or other responsive pleading has been filed or served by Defendant.

WHEREFORE, Plaintiff requests that the clerk of the court enter a default against this Defendant.

Date: 08/21/2023

/s/ Aaron E. de Leest
Signature
AARON E. DE LEEST
Printed name of Plaintiff or attorney for Plaintiff

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Aaron E. DE Leest Danning, Gill, Israel & Krasnoff, LLP 1901 Avenue of the Stars Ste 450 Los Angeles, CA 90067-6006 (310) 277-0077 <i>Plaintiff or Attorney for Plaintiff</i>	FOR COURT USE ONLY
<p align="center">UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA</p>	
In re: Jamie Lynn Gallian <div align="right">Debtor(s).</div>	CASE NO.: 8:21-bk-11710-SC CHAPTER: 7 ADVERSARY NUMBER: 8:23-ap-01064-SC
Jeffrey I. Golden <div align="right">Plaintiff(s)</div> <p align="center">Versus</p> J-Sandcastle Co LLC (See Attachment A for names of additional defendants) <div align="right">Defendant(s)</div>	<p align="center">SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]</p>

TO THE DEFENDANT(S): A Complaint has been filed by the Plaintiff against you. If you wish to defend against the Complaint, you must file with the court a written pleading in response to the Complaint. You must also serve a copy of your written response on the party shown in the upper left-hand corner of this page. The deadline to file and serve a written response is **08/02/2023**. If you do not timely file and serve the response, the court may enter a judgment by default against you for the relief demanded in the Complaint.

A status conference in the adversary proceeding commenced by the Complaint has been set for:

Date: September 26, 2023
Time: 01:30 PM
Hearing Judge: Scott C Clarkson
Location: 411 W Fourth St., Crtrm 5C, Santa Ana, CA 92701

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

You must comply with LBR 7016–1, which requires you to file a joint status report and to appear at a status conference. All parties must read and comply with the rule, even if you are representing yourself. You must cooperate with the other parties in the case and file a joint status report with the court and serve it on the appropriate parties at least 14 days before a status conference. A court–approved joint status report form is available on the court's website (LBR form F 7016–1.STATUS.REPORT) with an attachment for additional parties if necessary (LBR form F 7016–1.STATUS.REPORT.ATTACH). If the other parties do not cooperate in filing a joint status report, you still must file with the court a unilateral status report and the accompanying required declaration instead of a joint status report 7 days before the status conference. **The court may fine you or impose other sanctions if you do not file a status report. The court may also fine you or impose other sanctions if you fail to appear at a status conference.**

KATHLEEN J. CAMPBELL
CLERK OF COURT

Date of Issuance of Summons and Notice of Status Conference in Adversary Proceeding: July 3, 2023

By: "s/" Nickie Bolte
Deputy Clerk



This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

ATTACHMENT A
Names of plaintiffs and defendants

Plaintiff(s): Jeffrey I. Golden	Defendant(s): J-Sandcastle Co LLC J-Pad LLC Justin Barclay Steven D Gallian Ronald J. Pierpont Ronald J. McClelland E. J. Gallian Brian J. Gallian
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This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

ATTACHMENT A

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1901 Avenue of the Stars, Suite 450, Los Angeles, California 90067.

A true and correct copy of the foregoing document entitled: **SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]** and (2) the accompanying pleading(s) entitled: **ORDER RE: RULE 26(f) MEETING, INITIAL DISCLOSURES, AND SCHEDULING CONFERENCE; and CHAPTER 7 TRUSTEE'S COMPLAINT: (1) TO AVOID AND RECOVER FRAUDULENT TRANSFERS; (2) TO AVOID AND RECOVER POSTPETITION TRANSFERS; (3) FOR DECLARATORY RELIEF; (4) FOR BREACH OF CONTRACT; (5) FOR MONEY HAD AND RECEIVED; **** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) July 6, 2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On (date) July 6, 2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

****AND (6) UNJUST ENRICHMENT**

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 6, 2023
Date

Beverly Lew
Printed Name

/s/ Beverly Lew
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

December 2016

F 7004-1.SUMMONS.ADV.PROC

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

Aaron E. DE Leest on behalf of Plaintiff Jeffrey I. Golden
adeleest@DanningGill.com, danninggill@gmail.com;adeleest@ecf.inforuptcy.com

Robert P Goe on behalf of Interested Party The Huntington Beach Gables Homeowners
Association
kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com

Jeffrey I Golden (TR)
lwerner@go2.law, jig@trustesolutions.net;kadele@go2.law;C205@ecfcbis.com

United States Trustee (SA)
ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

J-Sandcastle Co., LLC
Jamie Lynn Gallian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

J-Pad LLC
Jamie Lynn Gallian, Managing Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

Steven Gallian
2633 Luminous Lane
Costa Mesa, CA 92626

Brian Gallian
924 Junipero Drive
Costa Mesa, CA 92626

Justin Barclay
2407 N Driftwood Avenue
Rialto, CA 92377

Ronald J. Pierpont
4519 Ponderosa Way
Yorba Linda, CA 92886

Robert J. McLelland
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

E. J. Gallian and Brian Gallian
924 Junipero Drive
Costa Mesa, CA 92626

The Honorable Scott C. Clarkson
U.S. Bankruptcy Court
411 W. Fourth Street, Suite 5130
Santa Ana, CA 92701

ERIC P. ISRAEL (State Bar No. 132426)
eisrael@DanningGill.com
AARON E. DE LEEST (State Bar No. 216832)
adeleest@DanningGill.com
DANNING, GILL, ISRAEL & KRASNOFF, LLP
1901 Avenue of the Stars, Suite 450
Los Angeles, California 90067-6006
Telephone: (310) 277-0077
Facsimile: (310) 277-5735

Attorneys for Plaintiff Jeffrey I. Golden,
Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re
JAMIE LYNN GALLIAN,
Debtor.

Case No. 8:21-bk-11710-SC
Chapter 7

JEFFREY I. GOLDEN, Chapter 7 Trustee,
Plaintiff,

Adv. No. 8:23-ap-01064-SC

vs.

**DECLARATION OF AARON E. DE
LEEST IN SUPPORT OF REQUEST FOR
ENTRY OF DEFAULT AGAINST
DEFENDANT J-PAD LLC**

J-SANDCASTLE CO., LLC; J-PAD LLC;
STEVEN D. GALLIAN; BRIAN J.
GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
AND E. J. GALLIAN,
Defendants.

I, Aaron E. de Leest, declare as follows:

1. I am an attorney, licensed and entitled to practice in the State of California. I am an attorney at Danning, Gill, Israel & Krasnoff, LLP, the duly employed counsel for Jeffrey I. Golden, Chapter 7 Trustee (the "Trustee"), for the estate of Jamie Lynn Gallian (the "Debtor") and the plaintiff in the above-entitled adversary proceeding. I am one of the attorneys at that firm primarily

1 responsible for handling this case. The facts stated herein are known to be true of my own personal
2 knowledge.

3 2. On or about June 30, 2023, I filed the Trustee's Complaint: (1) to Avoid and
4 Recover Fraudulent Transfers; (2) to Avoid and Recover Postpetition Transfers; (3) for Declaratory
5 Relief; (4) for Breach of Contract; (5) for Money had and Received; and (6) for Unjust
6 Enrichment" against J-Sandcastle Co., LLC, J-Pad LLC, Steven D. Gallian, Brian J. Gallian, Justin
7 Barclay, Ronald J. Pierpont, Robert J. Mclelland, and E. J. Gallian (docket no. 1) (the
8 "Complaint"), commencing Adversary Proceeding No. 8:23-ap-01064-SC (the "Adversary
9 Proceeding").

10 3. On July 6, 2023, my office served the Summons and Notice of Status Conference in
11 Adversary Proceeding (LBR 7004-1); Complaint; Notice of Required Compliance with FRBP 7026
12 and LBR 7026-1; and Order Setting Procedures for Adversary Proceeding Status Conferences J-
13 Pad LLC by U.S. mail pursuant to Federal Rule of Bankruptcy Procedure 7004.

14 4. According to the summons, J-Pad LLC had until August 2, 2023, to file and serve a
15 responsive pleading to the Complaint.

16 5. As of the date of this declaration, J-Pad LLC has not answered or otherwise
17 responded to the Complaint.

18 6. Accordingly, because J-Pad LLC has failed to plead or otherwise defend as provided
19 by the Federal Rules of Bankruptcy Procedure and the Federal Rules of Civil Procedure, I have
20 filed a Request for Clerk to Enter Default under LBR 7055-1(A) against J-Pad LLC.

21 7. Based upon the foregoing, I believe that the entry of default with respect to this
22 adversary proceeding against J-Pad LLC is appropriate.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on August 21, 2023 at Los Angeles, California.

25 
26 AARON E. DE LEEST
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
1901 Avenue of the Stars, Suite 450, Los Angeles, California 90067.

A true and correct copy of the foregoing document entitled: **REQUEST FOR CLERK TO ENTER DEFAULT UNDER LBR 7055-1(a)** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 08/21/2023, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 08/21/2023, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL *(state method for each person or entity served)*: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>08/21/2023</u>	<u>Beverly Lew</u>	<u>/s/ Beverly Lew</u>
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)

Bradford Barnhardt on behalf of Interested Party Courtesy NEF
bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, kfrederick@ecf.courtdrive.com

Aaron E. DE Leest on behalf of Plaintiff Jeffrey I. Golden
adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com

Robert P Goe on behalf of Interested Party The Huntington Beach Gables Homeowners Association
kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com

Jeffrey I Golden (TR)
lwerner@go2.law, jig@trustesolutions.net; kadele@go2.law; C205@ecfcbis.com

D Edward Hays on behalf of Interested Party Courtesy NEF
ehays@marshackhays.com,
ehays@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com; cmendoza@marshackhays.com; cmendoza@ecf.courtdrive.com

United States Trustee (SA)
ustpreion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

J-PAD LLC	The Honorable Scott C. Clarkson
Jamie Lynn Gallian, Managing Member	U.S. Bankruptcy Court
16222 Monterey Ln Unit 376	411 W. Fourth Street, Suite 5130
Huntington Beach, CA 92649	Santa Ana, CA 92701